

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RONDELL A. JOHNSON, as Independent)
Administrator of the Estate of RODNEY)
BRADFORD, Deceased,)
Plaintiff,)
v.) Case # 2024-CV-11692
THE UNITED STATES OF AMERICA,) Hon. Lindsay C. Jenkins
Et al,)
Defendants,)

CALIFORNIA TERRACE SNF LLC'S MOTION TO SET ASIDE ENTRY OF DEFAULT

Defendant CALIFORNIA TERRACE SNF LLC, by and through CHARLES AARON SILVERMAN, requests that this Honorable Court set aside and vacate the default entered against it, stating:

A meet and confer regarding the pending Motion to Quash occurred on 7/31/25. Counsel for Plaintiff took the position that the Motion in question attacked the integrity of the process server, whereas the Movant believes that the process server was simply mistaken. This Counsel being more familiar with the State of Illinois' practices regarding these matters, a "quash and submit" motion is usually accepted and entered in State court, and no such inference is taken against the process server. However Counsel for Plaintiff have taken the position that if done so it is an attack on their process server's integrity, and after explaining their thoughts on the matter, this Counsel sees their point (and such an attack was not desired). Given this, and given that the Court has given its opinion on what it expects from the Movant in its most recent order, California Terrace SNF LLC withdraws that pending motion, and hereby requests relief under Federal Rule of Civil Procedure 55(c), "The court may set aside an entry of default for good cause." Not seeking

any further delay in this matter, California Terrace SNF LLC can have a responsive pleading on file within 14 days.

WHEREFORE, California Terrace SNF LLC prays that the Motion to Quash be withdrawn, that the default be vacated, and that California Terrace SNF LLC be given 14 days to file a responsive pleading in this matter, and for such relief as may be equitable and just.

Respectfully Submitted,

/s/Charles Aaron Silverman

Attorney for Defendant California Terrace SNF LLC

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